

EXHIBIT 15

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICHARD ROSARIO,

Plaintiff,

-against-

THE CITY OF NEW YORK, *et al.*,

Defendants.

18-cv-4023 (LGS)

DECLARATION OF GERARDO ROMO

I, GERARDO ROMO, an attorney admitted to practice in the State of New York and the Southern District of New York, submit this declaration under penalty of perjury:

1. I am an associate at the firm Neufeld Scheck & Brustin, LLP (“NSB”), with offices at 99 Hudson Street, 8th Floor, New York, New York 10013.

2. I make this declaration in support of an application for attorneys’ fees pursuant to 42 U.S.C. § 1988, covering the hours I expended on this matter. I am fully familiar with the facts discussed herein.

EDUCATION AND EXPERIENCE

3. I graduated from New York University Law School in 2019. While in law school, I served as an Executive Editor for the *NYU Law Review*, was a Latinx Rights Scholar, and was recognized as an Arthur Garfield Hays Civil Liberties Fellow. After my graduation, I joined the Racial Justice Program of the American Civil Liberties Union as a Marvin M. Karparkin Fellow. I then clerked for the Honorable James L. Cott in the Southern District of New York. In September 2021, I joined NSB as an associate. My resume is attached as Exhibit A.

4. At NSB, I work almost exclusively on 42 U.S.C. § 1983 civil rights litigation in federal courts around the country. My practice focuses on wrongful conviction cases such as Richard Rosario's, involving lawsuits against police, prosecutors and/or state and municipal crime lab employees for unconstitutional misconduct. This body of law, arising at the intersection of criminal procedure and civil rights, is relatively new and constantly evolving. To my knowledge, NSB is the only firm in the nation litigating these issues full time.

5. Generally, all these cases involve procedural defenses such as absolute and qualified immunity and require a nuanced understanding of the differences between what it takes to vacate a criminal conviction and the elements of civil liability. In addition, the cases typically involve the same sets of claims, including for fabrication of evidence, *Brady*, and malicious prosecution, and involve similarly flawed inculpatory evidence, including misidentifications caused by suggestive identification procedures. My focus on these issues at NSB, as well as access to NSB's collective knowledge derived from litigating these cases for over twenty years, made my work on this case much more efficient than it otherwise would have been.

6. On behalf of Plaintiff, I am seeking compensation for my work at a rate of \$350 an hour. In my opinion, this requested rate is reasonable in light of the relevant market and my experience and skill.

WORK IN THIS CASE

7. I am seeking compensation, on behalf of Plaintiff, for the time I spent on this matter from December 2021 through October 2022.

8. Under the guidance of my senior colleagues, Emma Freudenberger, Nick Brustin, and Anna Benvenuti Hoffmann, I helped prepare Mr. Rosario for his direct and cross-examinations, supervised the paralegals and interns in the case, helped prepare for trial, drafted

pretrial materials, drafted various letters to the Court, met and coordinated with witnesses and experts, and helped prepare Dr. Agharkar for his direct and cross-examinations. During trial, I was heavily involved in preparing each day and drafting motions and letters to the Court, in addition to preparing, organizing, and setting up trial exhibit display.

9. As set forth in the billing records attached as Exhibit B, Chart 1, which come from contemporaneously kept timekeeping logs, I am seeking compensation for a total of 381.3 attorney hours in this matter, excluding my work on this fee application.

10. I have reviewed the attached billing record in its entirety, and made an effort to take a conservative and reasonable approach to the total hours for which I seek compensation. In my judgment, each hour set forth in Exhibit B, Chart 1 was necessitated by the circumstances and reasonably expended in pursuit of the ultimate favorable outcome in this complicated and important civil rights case.

WORK ON THE FEE APPLICATION

11. I am also seeking compensation for the time I spent on the § 1988 fee application in this case.

12. In connection with this fee petition, I prepared supporting affidavits, drafted the memorandum of law in support of our request, and reviewed time detail of the attorneys, paralegals and law clerks that worked on this case.

13. As set forth in the billing records attached as Exhibit B, Chart 2, which come from contemporaneously kept timekeeping logs, I am seeking compensation for a total of 54.6 hours for working on this fee application.

14. I have reviewed the attached billing record in its entirety, and made an effort to take a conservative and reasonable approach to the total hours for which I seek compensation. In my

judgment, each hour set forth in Exhibit B, Chart 2 was necessitated by the circumstances and reasonably expended in pursuit of the ultimate favorable outcome in this complicated and important civil rights case.

15. I hereby declare under penalty of perjury that the foregoing is true.

Date: October 7, 2022
New York, NY



GERARDO ROMO

EXHIBIT A

GERARDO ROMO

EDUCATION

NEW YORK UNIVERSITY SCHOOL OF LAW, New York, NY

J.D., May 2019

Honors: Latinx Rights Scholar – for leadership, academic excellence, and public service
Arthur Garfield Hays Civil Liberties Program, *Tom Stoddard Fellow for LGBT Rights*
NYU Law Review, Executive Editor
Marsha P. Johnson & Sylvia Rivera Leadership Award – for service to LGBTQ community
Law Alumni of Color Association Clinical Service Convocation Award
Dean John Sexton Convocation Prize – for outstanding service to the Law School

Activities: OUTLaw, Co-Chair
Latinx Law Students Association, Political Action & Community Service Chair
Coalition on Law & Representation, Leadership Collective
Law Students for Justice in Palestine, Board Member & Treasurer
Lawyering Teaching Assistant

COLUMBIA UNIVERSITY, New York, NY

Bachelor of Arts in Ethnic Studies with minor in Women's, Gender, and Sexuality Studies, May 2014

Honors: King's Crown Leadership Award (Building Bridges 2013, Indelible Mark 2014)
LGBTQ Community Leader Award (2012, 2013, 2014)

Activities: Proud Colors (LGBT people of color student group), Executive Board Member
Chicano Caucus, Community Chair, Political Chair, Gender & Sexuality Chair

EXPERIENCE

NEUFELD SCHECK & BRUSTIN, LLP, New York, NY

Johnnie L. Cochran Civil Rights Fellow, September 2021 – Present

HON. JAMES L. COTT, U.S. DISTRICT COURT, SOUTHERN DISTRICT OF NEW YORK, New York, NY

Law Clerk, September 2020 – September 2021

RACIAL JUSTICE PROGRAM, AMERICAN CIVIL LIBERTIES UNION, New York, NY

Marvin M. Karpatkin Fellow, August 2019 – August 2020

Drafted memoranda, motions, and writs and defended expert deposition in Fair Housing Act case challenging discriminatory criminal records screenings and occupancy restriction. Drafted successful letter brief in FOIA discovery matter resulting in order that government provide documents at four times its usual rate. Briefed Congresspeople and their staffs to advocate for their further oversight of the FBI. Drafted memoranda and met and conferred with government attorneys in FOIA matters. Partnered with community groups to investigate criminalization of youth of color in schools. Drafted model letters for affiliates regarding hate crimes & racial impact of COVID-19. Supervised summer legal interns.

SEX WORKERS PROJECT, URBAN JUSTICE CENTER, New York, NY

Immigration Legal Intern, January – May 2019

Prepared U visa, employment authorization renewal, and adjustment of status applications and affidavits with LGBT clients. Met with Spanish-speaking clients to translate and confirm affidavits to support their immigration applications. Researched NY sealing laws for sex work decriminalization campaign.

CENTER FOR CONSTITUTIONAL RIGHTS, New York, NY

Legal Intern, September – December 2018

Wrote memoranda regarding the extraterritorial application of the Due Process Clause at the U.S.-Mexico border as it relates to the denial of asylum, First Amendment retaliation cases on behalf of organizations, and the history and use of Immigration and Nationality Act (INA) § 212(f).

GERARDO ROMO

PROFESSOR ALINA DAS, NEW YORK UNIVERSITY SCHOOL OF LAW, New York, NY

Research Assistant, June 2018 – January 2019

Wrote memoranda on the history of anti-Blackness and immigration law and the criminalization of Muslim immigrants in the United States through immigration policy.

IMMIGRANT RIGHTS CLINIC, NEW YORK UNIVERSITY SCHOOL OF LAW, New York, NY

Student Advocate, August 2017 – May 2019

Co-drafted briefs and argued *Hylton v. Sessions* in the Second Circuit, which held that NYPL § 221.45 is not an aggravated felony under the INA. Co-wrote amicus brief in Second and Fourth Circuits on behalf of former immigration judges regarding *Pereira v. Sessions*. Co-wrote brief in Second Circuit challenging denial of asylum and motion to reopen. Co-drafted writs of habeas corpus. Co-drafted motion to reopen asylum claims for 12-year-old Salvadoran client. Co-wrote successful motion and reply brief for stays of removal. Co-drafted community-based curriculum on the school-to-deportation pipeline with Black Alliance for Just Immigration.

CRIMINAL LAW REFORM PROJECT, AMERICAN CIVIL LIBERTIES UNION, New York, NY

Legal Intern, June – August 2018

Wrote memoranda on tort claims for bounty hunters and their insurers, on *Younger* abstention doctrine, and the *Rooker-Feldman* doctrine for § 1983 claims when habeas relief is unavailable. Assisted with preparation of witnesses for TRO hearing for a lawsuit in Dallas, TX challenging wealth-based pre-trial detention scheme.

IMMIGRANT DEFENSE PROJECT, New York, NY

Legal Intern, June – August 2017

Drafted advice for criminal lawyers on the immigration consequences of their clients' criminal convictions. Wrote memorandum on the success of habeas corpus writs in remedying conditions of confinement in prisons. Drafted practice note for challenging evidence of gang-related activity at immigration court bond hearings. Researched racial disparities in pre-trial detention and juvenile detention for Second Circuit amicus brief. Collected and organized data related to ICE raids in New York City for ICE raids map.

BRONX DEFENDERS, Bronx, NY

LGBTQ Working Group Legal Intern, September 2016 – April 2017

Analyzed internal documents to make more inclusive and relevant to transgender and gender non-conforming clients. Compiled resources for LGBT clients.

CENTER FOR APPELLATE LITIGATION, New York, NY

Paralegal, January 2015 – August 2016

Drafted appellate briefs for sentence reductions. Wrote parole packets to NY State prison parole boards. Translated lawyer-client meetings. Visited and interviewed clients in prisons and on Rikers Island. Wrote letters advocating for incarcerated clients' medical and safety needs.

ADMISSIONS

Admitted to practice in New York, Southern District of New York, Eastern District of New York, and District of Colorado.

EXHIBIT B

CHART 1
SUBSTANTIVE HOURS

Date	Person	Client	Activity	Description	Duration	Time Totals
8-Dec-21	Gerardo Romo	Rosario (Richard)	Review	case materials	1:06	1.1
8-Dec-21	Gerardo Romo	Rosario (Richard)	Review	case materials	1:18	1.3
9-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	team meeting emma, anna, nick, katie, cam	1:40	1.7
9-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	katie, cam,	0:45	0.8
9-Dec-21	Gerardo Romo	Rosario (Richard)	Review	case materials	0:36	0.6
9-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	Richard digest	1:18	1.3
10-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	richard topic digest	6:42	6.7
11-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	richard digest	5:30	5.5
12-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	richard by topic digest	4:06	4.1
13-Dec-21	Gerardo Romo	Rosario (Richard)	Digest	richard topic prep	6:06	6.1
14-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	by topic digest	8:00	8.0
15-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	on designation kayla, katie, nick, emma, anna	1:46	1.8
15-Dec-21	Gerardo Romo	Rosario (Richard)	Review	silverman designation	0:24	0.4
15-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	update stip	0:20	0.3
15-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	team meeting anna nick cam katie kayla	0:30	0.5
15-Dec-21	Gerardo Romo	Rosario (Richard)	Review	trial protocol	0:30	0.5
15-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	list of objections re richard	0:30	0.5
16-Dec-21	Gerardo Romo	Rosario (Richard)	Review	limine rulings on richard	0:30	0.5
16-Dec-21	Gerardo Romo	Rosario (Richard)	Court appearance	pretrial conference	2:00	2.0
16-Dec-21	Gerardo Romo	Rosario (Richard)	Review	export report	0:18	0.3
17-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	with richard and nick	0:54	0.9
17-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	prep with richard and nick	0:41	0.7
17-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	letter on nominal damages	2:30	2.5
17-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	notes/digest 12.17 meeting	0:54	0.9
17-Dec-21	Gerardo Romo	Rosario (Richard)	Review	expert report	0:06	0.1
19-Dec-21	Gerardo Romo	Rosario (Richard)	Research	letter jury nominal charges	1:30	1.5
20-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	letter on damages	4:42	4.7
20-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	team meeting on desig anna, emma, kayla, katie	0:32	0.5
20-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	cover letter on desigantions	2:48	2.8
21-Dec-21	Gerardo Romo	Rosario (Richard)	Review	dep desig	0:48	0.8
21-Dec-21	Gerardo Romo	Rosario (Richard)	Court appearance	pretrial conference	1:47	1.8

21-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	cover letter dep desig	0:18	0.3
21-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	team meeting, katie, nick, anna, emma, kayla	0:27	0.5
22-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	meet and confer	1:00	1.0
22-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	joint letter	2:06	2.1
22-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	letter on jury	3:00	3.0
23-Dec-21	Gerardo Romo	Rosario (Richard)	Review	joint letter	1:24	1.4
23-Dec-21	Gerardo Romo	Rosario (Richard)	Review	expert reports on damages	3:06	3.1
23-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	letter on jury names	0:12	0.2
24-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	letter on jury list	1:23	1.4
27-Dec-21	Gerardo Romo	Rosario (Richard)	Review	notes on 12.17 meeting/ outline	1:48	1.8
27-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	expert dep digests	3:06	3.1
27-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	expert testimony with PTSD	3:12	3.2
28-Dec-21	Gerardo Romo	Rosario (Richard)	Review	organize notes on richard prep	0:30	0.5
28-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	parker by topic digest	0:42	0.7
28-Dec-21	Gerardo Romo	Rosario (Richard)	Review	opening	0:18	0.3
28-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	organize notes from meeting with richard	1:00	1.0
28-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	prep with richard	2:42	2.7
28-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	team meeting nick emma, anna katie	2:56	2.9
29-Dec-21	Gerardo Romo	Rosario (Richard)	Review	february robbery docs	0:30	0.5
29-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	letter on reconsideration	2:54	2.9
29-Dec-21	Gerardo Romo	Rosario (Richard)	Review	richard direct	0:42	0.7
29-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	topic digest parker	0:42	0.7
29-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	letter in deposition dep	0:54	0.9
29-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	with julian mo, kayla, katie on trial exhibit	0:45	0.8
30-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	prep with richard	2:00	2.0
30-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	letter on dep designations	0:25	0.4
30-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	organize notes from richard prep	1:00	1.0
30-Dec-21	Gerardo Romo	Rosario (Richard)	Prep	parker by topic digest	2:36	2.6
31-Dec-21	Gerardo Romo	Rosario (Richard)	Review	opening	0:30	0.5
31-Dec-21	Gerardo Romo	Rosario (Richard)	Meeting	team meeting nick anna emma katie cam	1:30	1.5
31-Dec-21	Gerardo Romo	Rosario (Richard)	Draft	topic digest parker	3:06	3.1
3-Jan-22	Gerardo Romo	Rosario (Richard)	Prep	parker by topic digest	1:54	1.9
3-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	by topic digest Fayer	1:48	1.8
4-Jan-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting next steps katie cam anna nick emma	0:25	0.4

4-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	by topic digest fayer	1:54	1.9
5-Jan-22	Gerardo Romo	Rosario (Richard)	Meeting	meet and confer	0:16	0.3
5-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	fayer by topic	3:54	3.9
6-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	by topic fayer	1:06	1.1
9-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	fayer by topic digest	1:12	1.2
10-Jan-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting katie, anna, cam, kayla, emma, nick	0:45	0.8
10-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	by topic fayer	3:30	3.5
11-Jan-22	Gerardo Romo	Rosario (Richard)	Meeting	meeting emma, cam, katie	0:20	0.3
11-Jan-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting on demonstratives	0:24	0.4
11-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	fayer by topic	3:42	3.7
11-Jan-22	Gerardo Romo	Rosario (Richard)	Review	disciplinary history / SHU	1:06	1.1
12-Jan-22	Gerardo Romo	Rosario (Richard)	Review	prison records	0:30	0.5
12-Jan-22	Gerardo Romo	Rosario (Richard)	Review	bad acts	0:42	0.7
12-Jan-22	Gerardo Romo	Rosario (Richard)	Meeting	prep with richard	1:55	1.9
12-Jan-22	Gerardo Romo	Rosario (Richard)	Court appearance	PTC	1:05	1.1
13-Jan-22	Gerardo Romo	Rosario (Richard)	Administrative	technology form	0:30	0.5
13-Jan-22	Gerardo Romo	Rosario (Richard)	Draft	nicole torres letter	0:06	0.1
13-Jan-22	Gerardo Romo	Rosario (Richard)	Review	1992 arrest	0:42	0.7
13-Jan-22	Gerardo Romo	Rosario (Richard)	Meeting	with Anna on expert prep	0:15	0.3
13-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	parker digest	3:12	3.2
14-Jan-22	Gerardo Romo	Rosario (Richard)	Court appearance	conference	0:30	0.5
14-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	parker digest	2:48	2.8
18-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	parker	1:18	1.3
18-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	parker	1:12	1.2
19-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	parker	3:30	3.5
20-Jan-22	Gerardo Romo	Rosario (Richard)	Digest	parker	4:06	4.1
27-Apr-22	Gerardo Romo	Rosario (Richard)	Meeting	meet and confer re jury instructions	0:19	0.3
10-May-22	Gerardo Romo	Rosario (Richard)	Meeting	emma kaitie nick amelia anna cam	0:30	0.5
10-May-22	Gerardo Romo	Rosario (Richard)	Review	expert docs	0:30	0.5
18-May-22	Gerardo Romo	Rosario (Richard)	Review	order on jury questionnaire	0:12	0.2
19-May-22	Gerardo Romo	Rosario (Richard)	Draft	jury questionnaire	1:42	1.7
25-May-22	Gerardo Romo	Rosario (Richard)	Court appearance	court meeting	0:37	0.6
26-May-22	Gerardo Romo	Rosario (Richard)	Draft	jury questionnaire	0:12	0.2
26-May-22	Gerardo Romo	Rosario (Richard)	Administrative	coordinate meeting with richard and agharkar	0:23	0.4

31-May-22	Gerardo Romo	Rosario (Richard)	Draft	juror questionnaire	1:42	1.7
31-May-22	Gerardo Romo	Rosario (Richard)	Draft	juror questionnaire	0:42	0.7
31-May-22	Gerardo Romo	Rosario (Richard)	Meeting	anna and emma jury questionaiire	0:30	0.5
3-Jun-22	Gerardo Romo	Rosario (Richard)	Draft	juror questionnaire	1:42	1.7
3-Jun-22	Gerardo Romo	Rosario (Richard)	Draft	juror questionnaire	0:12	0.2
6-Jun-22	Gerardo Romo	Rosario (Richard)	Adminstrative	facilitate richard meeting with	0:10	0.2
14-Jun-22	Gerardo Romo	Rosario (Richard)	Meeting	opening feed back	2:23	2.4
14-Jun-22	Gerardo Romo	Rosario (Richard)	Review	review opening	0:42	0.7
15-Jun-22	Gerardo Romo	Rosario (Richard)	Meeting	review opening with office	2:10	2.2
16-Jun-22	Gerardo Romo	Rosario (Richard)	Meeting	onboarding new team members	0:30	0.5
16-Jun-22	Gerardo Romo	Rosario (Richard)	Meeting	meet and confer emma katie cam opp counsel	0:15	0.3
5-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	kattie emma cam	0:20	0.3
6-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	nick/amelia	0:20	0.3
6-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting nick amelia emma katie cam	0:32	0.5
6-Jul-22	Gerardo Romo	Rosario (Richard)	Review	MIL on crim	0:18	0.3
7-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	crim bad acts mil	0:54	0.9
8-Jul-22	Gerardo Romo	Rosario (Richard)	Review	richard dep	0:36	0.6
8-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	richard nick amelia prep	1:45	1.8
10-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	bad acts ruling	1:30	1.5
12-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	prep with richard, nick amelia	1:50	1.8
12-Jul-22	Gerardo Romo	Rosario (Richard)	Review	exp reports	1:00	1.0
12-Jul-22	Gerardo Romo	Rosario (Richard)	Review	expert report	0:30	0.5
13-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	bad acts, experts, rulings	3:30	3.5
14-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	email on conference	0:40	0.7
14-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	joint letter	2:24	2.4
14-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	prep with richard	2:00	2.0
15-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	email bad acts/texts	0:42	0.7
15-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	events for damages	5:36	5.6
16-Jul-22	Gerardo Romo	Rosario (Richard)	Prep	prep with richard, notes	1:30	1.5
17-Jul-22	Gerardo Romo	Rosario (Richard)	Phone Call	richard, verizon, apple	1:00	1.0
18-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting re: trial	1:00	1.0
18-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	email re courtroom logisitics	0:10	0.2
18-Jul-22	Gerardo Romo	Rosario (Richard)	Phone Call	call w/Katie	0:16	0.3
18-Jul-22	Gerardo Romo	Rosario (Richard)	Phone Call	richard/verizon	0:40	0.7

18-Jul-22	Gerardo Romo	Rosario (Richard)	Phone Call	Deputy clerk on courtroom	0:30	0.5
18-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	letter for text messages	0:15	0.3
18-Jul-22	Gerardo Romo	Rosario (Richard)	Phone Call	call/email with expert	0:17	0.3
18-Jul-22	Gerardo Romo	Rosario (Richard)	Research	apple/verizon policies on retrieving data	0:28	0.5
18-Jul-22	Gerardo Romo	Rosario (Richard)	Review	rulings on sanchez patrakaus	1:18	1.3
19-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	instructions on juror questionnaire	0:42	0.7
19-Jul-22	Gerardo Romo	Rosario (Richard)	Phone Call	call with jerry cellphone expert	0:10	0.2
19-Jul-22	Gerardo Romo	Rosario (Richard)	Review	ruling on petrauskas / sanchez	2:12	2.2
19-Jul-22	Gerardo Romo	Rosario (Richard)	Review	richard direct	0:36	0.6
19-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting prep court conference	1:00	1.0
19-Jul-22	Gerardo Romo	Rosario (Richard)	Court appearance	court conference	1:10	1.2
19-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	anna nick amelai bad acts	0:30	0.5
19-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting after conference	1:01	1.0
19-Jul-22	Gerardo Romo	Rosario (Richard)	Review	richard admissions criminal histroyt	0:24	0.4
19-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	letter on bad acts to court	3:36	3.6
20-Jul-22	Gerardo Romo	Rosario (Richard)	Review	sources of bad acts crim history	1:24	1.4
20-Jul-22	Gerardo Romo	Rosario (Richard)	Phone Call	tech walk thru hannah and street	0:21	0.4
20-Jul-22	Gerardo Romo	Rosario (Richard)	Review	1992 charge/edits to letter on bad acts	2:06	2.1
20-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	meeing letter on bad acts nick emma amelia anna	0:30	0.5
20-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	changes to letter	1:12	1.2
20-Jul-22	Gerardo Romo	Rosario (Richard)	Review	criminal history	0:54	0.9
20-Jul-22	Gerardo Romo	Rosario (Richard)	Review	opening	0:36	0.6
21-Jul-22	Gerardo Romo	Rosario (Richard)	Digest	Sanchez	2:00	2.0
21-Jul-22	Gerardo Romo	Rosario (Richard)	Review	opening	0:36	0.6
21-Jul-22	Gerardo Romo	Rosario (Richard)	Review	damages openign	0:37	0.6
21-Jul-22	Gerardo Romo	Rosario (Richard)	Review	testimony on martinez/ opening	0:54	0.9
22-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	court room walk through	0:55	0.9
22-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeeting	0:59	1.0
22-Jul-22	Gerardo Romo	Rosario (Richard)	Review	time for silverman	1:06	1.1
22-Jul-22	Gerardo Romo	Rosario (Richard)	Review	fernando dep	0:30	0.5
23-Jul-22	Gerardo Romo	Rosario (Richard)	Review	prison files	0:24	0.4
23-Jul-22	Gerardo Romo	Rosario (Richard)	Phone Call	phone call amelia on expert	0:36	0.6
24-Jul-22	Gerardo Romo	Rosario (Richard)	Phone Call	agharkar amelia nick	0:57	1.0
24-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	jury consultants	1:40	1.7

24-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	with expert dysart	1:55	1.9
24-Jul-22	Gerardo Romo	Rosario (Richard)	Research	juror reserach	1:54	1.9
24-Jul-22	Gerardo Romo	Rosario (Richard)	Review	jury infor	1:12	1.2
25-Jul-22	Gerardo Romo	Rosario (Richard)	Court appearance	trial	9:00	9.0
25-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	letter on sanctions	3:00	3.0
25-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	meeting team	1:00	1.0
25-Jul-22	Gerardo Romo	Rosario (Richard)	Prep	trial prep tasks	0:55	0.9
27-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	letter on bad acts	3:06	3.1
27-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	edits on bad acts letter	1:06	1.1
27-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	plan on witnesses	0:06	0.1
27-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting then meeting with katie cam then amelia	1:40	1.7
27-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting	1:00	1.0
27-Jul-22	Gerardo Romo	Rosario (Richard)	Prep	review cruger testimony for richard prep	0:24	0.4
27-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	agharkar direct	0:42	0.7
28-Jul-22	Gerardo Romo	Rosario (Richard)	Review	nicole torress docs	0:24	0.4
28-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	nicole strategy, emma, nick amelia	1:30	1.5
28-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	agharkar direct	8:06	8.1
28-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	letter on txts	1:36	1.6
29-Jul-22	Gerardo Romo	Rosario (Richard)	Draft	letter dep desig	0:29	0.5
29-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	prep with richard	2:00	2.0
29-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	meeting on whitaker exhibits	2:23	2.4
29-Jul-22	Gerardo Romo	Rosario (Richard)	Review	whitaker outline	2:00	2.0
30-Jul-22	Gerardo Romo	Rosario (Richard)	Review	whitaker outline	2:48	2.8
30-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	cam on ex	0:26	0.4
30-Jul-22	Gerardo Romo	Rosario (Richard)	Review	RR crim history	0:47	0.8
30-Jul-22	Gerardo Romo	Rosario (Richard)	Meeting	prep with Agharkar	1:30	1.5
31-Jul-22	Gerardo Romo	Rosario (Richard)	Review	richard docs for prep	0:40	0.7
31-Jul-22	Gerardo Romo	Rosario (Richard)	Review	whitaker outline	2:06	2.1
31-Jul-22	Gerardo Romo	Rosario (Richard)	Review	agharkar docs	0:18	0.3
31-Jul-22	Gerardo Romo	Rosario (Richard)	Review	whitaker exs	1:34	1.6
31-Jul-22	Gerardo Romo	Rosario (Richard)	Review	prepare exhibits torres whitaker, review preadmit list, redactions, review whitaker	2:12	2.2

1-Aug-22	Gerardo Romo	Rosario (Richard)	Court appearance	trial	7:55	7.9
1-Aug-22	Gerardo Romo	Rosario (Richard)	Review	expert disclo	0:54	0.9
1-Aug-22	Gerardo Romo	Rosario (Richard)	Meeting	meeting on davis exhibihts	0:33	0.6
1-Aug-22	Gerardo Romo	Rosario (Richard)	Review	lymari leon desingation / trial time	0:48	0.8
1-Aug-22	Gerardo Romo	Rosario (Richard)	Review	trial prep	0:24	0.4
1-Aug-22	Gerardo Romo	Rosario (Richard)	Review	minerva dep	0:42	0.7
2-Aug-22	Gerardo Romo	Rosario (Richard)	Review	agharkar disclosures	0:30	0.5
2-Aug-22	Gerardo Romo	Rosario (Richard)	Review	cruger sanchez outline	2:18	2.3
2-Aug-22	Gerardo Romo	Rosario (Richard)	Court appearance	trial	7:30	7.5
2-Aug-22	Gerardo Romo	Rosario (Richard)	Review	sanchez testimony	1:00	1.0
2-Aug-22	Gerardo Romo	Rosario (Richard)	Review	sanchez ref for second perp	0:41	0.7
3-Aug-22	Gerardo Romo	Rosario (Richard)	Research	rules on prep	0:24	0.4
3-Aug-22	Gerardo Romo	Rosario (Richard)	Draft	notes on richard prep/ review minerva dep	1:06	1.1
3-Aug-22	Gerardo Romo	Rosario (Richard)	Review	bad acts	0:18	0.3
3-Aug-22	Gerardo Romo	Rosario (Richard)	Court appearance	trial	7:30	7.5
4-Aug-22	Gerardo Romo	Rosario (Richard)	Court appearance	trial	7:30	7.5
5-Aug-22	Gerardo Romo	Rosario (Richard)	Review	minerva digest	0:34	0.6
5-Aug-22	Gerardo Romo	Rosario (Richard)	Review	prison record	1:28	1.5
5-Aug-22	Gerardo Romo	Rosario (Richard)	Review	fayer report and dep	1:48	1.8
5-Aug-22	Gerardo Romo	Rosario (Richard)	Prep	prep with Agharkar	2:14	2.2
5-Aug-22	Gerardo Romo	Rosario (Richard)	Deposition	agharkar dep	0:40	0.7
5-Aug-22	Gerardo Romo	Rosario (Richard)	Review	medical records	1:12	1.2
6-Aug-22	Gerardo Romo	Rosario (Richard)	Review	testimony on injuries	0:42	0.7
6-Aug-22	Gerardo Romo	Rosario (Richard)	Review	medical records and bad acts	2:18	2.3
6-Aug-22	Gerardo Romo	Rosario (Richard)	Meeting	team meeting	0:53	0.9
6-Aug-22	Gerardo Romo	Rosario (Richard)	Draft	brief on bad acts	1:42	1.7
6-Aug-22	Gerardo Romo	Rosario (Richard)	Review	parker report	0:30	0.5
7-Aug-22	Gerardo Romo	Rosario (Richard)	Review	chip texts images for court	2:16	2.3
7-Aug-22	Gerardo Romo	Rosario (Richard)	Review	richard trial testimny, witness crim trial testimony	2:42	2.7
7-Aug-22	Gerardo Romo	Rosario (Richard)	Review	parker dep	0:30	0.5
7-Aug-22	Gerardo Romo	Rosario (Richard)	Review	richard book	3:24	3.4
7-Aug-22	Gerardo Romo	Rosario (Richard)	Review	chip texts	1:30	1.5
8-Aug-22	Gerardo Romo	Rosario (Richard)	Meeting	prep with richard	1:00	1.0
8-Aug-22	Gerardo Romo	Rosario (Richard)	Court appearance	trial	8:30	8.5

8-Aug-22	Gerardo Romo	Rosario (Richard)	Review	review parker	0:48	0.8
9-Aug-22	Gerardo Romo	Rosario (Richard)	Prep	videos for jury	0:36	0.6
9-Aug-22	Gerardo Romo	Rosario (Richard)	Court appearance	trial	8:00	8.0
9-Aug-22	Gerardo Romo	Rosario (Richard)	Meeting	pretrial meeting with richard	1:15	1.3
9-Aug-22	Gerardo Romo	Rosario (Richard)	Meeting	closing prep, work on powerpoint/closing	4:30	4.5
10-Aug-22	Gerardo Romo	Rosario (Richard)	Court appearance	trial	3:00	3.0
10-Aug-22	Gerardo Romo	Rosario (Richard)	Meeting	meeting with richard pretrial	1:20	1.3
11-Aug-22	Gerardo Romo	Rosario (Richard)	Court appearance	jury verdict	0:35	0.6
11-Aug-22	Gerardo Romo	Rosario (Richard)	Phone Call	call with richard	0:06	0.1

Total	381.3
--------------	--------------

CHART 2
FEE PETITION HOURS

Date	Person	Client	Activity	Description	Duration	Time Totals
15-Aug-22	Gerardo Romo	Rosario (Richard)	Meeting	amelia anna katie cam fee app	0:30	0.5
15-Aug-22	Gerardo Romo	Rosario (Richard)	Review	rules on fee application	0:30	0.5
15-Aug-22	Gerardo Romo	Rosario (Richard)	Draft	coordinate timeline and request for attorney fees	0:13	0.2
17-Aug-22	Gerardo Romo	Rosario (Richard)	Draft	letter motion extention req	0:54	0.9
17-Aug-22	Gerardo Romo	Rosario (Richard)	Meeting	meeting on fee application anna cam sona	0:36	0.6
18-Aug-22	Gerardo Romo	Rosario (Richard)	Phone Call	call with rick re fee app	0:16	0.3
18-Aug-22	Gerardo Romo	Rosario (Richard)	Phone Call	call/email former lawyers for fee app	0:41	0.7
2-Sep-22	Gerardo Romo	Rosario (Richard)	Meeting	check in re hours emma cam	0:34	0.6
6-Sep-22	Gerardo Romo	Rosario (Richard)	Review	hours for fee app	1:42	1.7
6-Sep-22	Gerardo Romo	Rosario (Richard)	Review	loan payoff dates and amounts	0:45	0.8
7-Sep-22	Gerardo Romo	Rosario (Richard)	Review	hours for fee app	2:12	2.2
13-Sep-22	Gerardo Romo	Rosario (Richard)	Meeting	on time records	0:36	0.6
16-Sep-22	Gerardo Romo	Rosario (Richard)	Meeting	emma sona anna cam nick on fee app	0:22	0.4
19-Sep-22	Gerardo Romo	Rosario (Richard)	Meeting	anna sona cam on fee app	0:27	0.5
19-Sep-22	Gerardo Romo	Rosario (Richard)	Review	fee app brief	0:15	0.3
19-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	review apps/email to attorneys on hours	1:18	1.3
19-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	affidavits for fee app/send hours to NSB attnys	1:00	1.0
19-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	template for fee app affidavit	0:30	0.5
20-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	attorney affidavits fee app: bettina, kate, rick	2:25	2.4
20-Sep-22	Gerardo Romo	Rosario (Richard)	Meeting	EF, NB, Cam, Sona, Anna on fee app	0:10	0.2
20-Sep-22	Gerardo Romo	Rosario (Richard)	Review	local rules on affidavit requirements	0:06	0.1
22-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	kamdang/rachel affidavit fee app	2:30	2.5
22-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	rachel affidavit edits	0:24	0.4
22-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	follow up emails with external attnys	0:12	0.2
23-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	amelia fee affidavit	0:20	0.3
23-Sep-22	Gerardo Romo	Rosario (Richard)	Meeting	anna, sona, cam, emma on fees	0:30	0.5
26-Sep-22	Gerardo Romo	Rosario (Richard)	Meeting	w/ madhuri re fee app research	0:29	0.5
26-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	chip fee affidavit	1:58	2.0
26-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	avi and Rhianna fee affidavits	0:36	0.6

27-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	edits to chip affidavit	0:42	0.7
27-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	edit and send avi rhianna affidavit	0:15	0.3
27-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	katie hours draft affidavit	0:36	0.6
30-Sep-22	Gerardo Romo	Rosario (Richard)	Meeting	nick emma anna sona on fee application	0:35	0.6
30-Sep-22	Gerardo Romo	Rosario (Richard)	Phone Call	madhuri on fee research	0:10	0.2
30-Sep-22	Gerardo Romo	Rosario (Richard)	Draft	fee application brief	4:12	4.2
2-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	fee app motion	2:18	2.3
2-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	motion for fees	5:24	5.4
3-Oct-22	Gerardo Romo	Rosario (Richard)	Meeting	meeting on fee app sona cam anna sara	0:24	0.4
3-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	follow up emails for fee affidavits	0:12	0.2
3-Oct-22	Gerardo Romo	Rosario (Richard)	Meeting	meeting on fee app brief: anna, sona, emma	0:37	0.6
3-Oct-22	Gerardo Romo	Rosario (Richard)	Research	costs in 2d circuit for fee app	0:30	0.5
3-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	edits on fee application brief	3:48	3.8
4-Oct-22	Gerardo Romo	Rosario (Richard)	Meeting	meet with Madhuri re research on costs	0:20	0.3
4-Oct-22	Gerardo Romo	Rosario (Richard)	Meeting	anna sona cam on fee app	0:25	0.4
4-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	fee brief edits	3:48	3.8
5-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	fee brief edits	1:30	1.5
5-Oct-22	Gerardo Romo	Rosario (Richard)	Meeting	on fee affidavit anna sonna cam	0:20	0.3
5-Oct-22	Gerardo Romo	Rosario (Richard)	Review	fee affidavit	0:10	0.2
5-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	edit fee app brief	0:42	0.7
5-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	fee brief edits	1:36	1.6
6-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	edits to fee brief	2:24	2.4
6-Oct-22	Gerardo Romo	Rosario (Richard)	Draft	edits on emma declaration	0:35	0.6

Total	54.6
--------------	-------------